

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

FILED  
RICHARD V. J.  
CLERK

MAR 15 PM 4:00

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ERLISA KING,

Defendant.

CASE NO.

**1:23CR 022**

JUDGE

**J. BARRETT**

INDICTMENT

18 U.S.C. § 1343

**THE GRAND JURY CHARGES:**

**COUNTS 1-20**  
**(Wire Fraud)**

Background

1. Victim-1 is a company that sells renter's insurance through its website.

The Scheme

2. From in or about May 2022 through in or about June 2022, the defendant, Erlisa King, devised and intended to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means

3. It was part of the scheme that King used Victim-1's website to apply for hundreds of renter's insurance policies—including those listed below as Counts 1 through 20—for apartments in or about Cincinnati, Ohio.
4. It was part of the scheme that King would supply a bogus bank account number for payment of the premium for the policies.

5. It was part of the scheme that King would immediately cancel the policies and request a refund to a debit card that she controlled.
6. It was part of the scheme that King withdrew or spent the refunded money from the debit cards.

Execution of the Scheme

7. On or about the dates listed below, in the Southern District of Ohio and elsewhere, the defendant, Erlisa King, for the purpose of executing the scheme described above, did transmit and cause to be transmitted in interstate commerce, by means of wire communications, certain signs, signals, pictures and sound described below for each count, each transmission constituting a separate count:

<b>Count</b>	<b>Policy Number</b>	<b>Policy Enrollment Date</b>
1	34HQ0XW55	5/23/2022
2	34HQ0XW53	5/23/2022
3	34HQ0XW50	5/23/2022
4	34HQ0XW4X	5/23/2022
5	34HQ0XWW4	5/24/2022
6	34HQ0XWVX	5/24/2022
7	34HQ0XWVW	5/24/2022
8	34HQ0XY16	5/25/2022
9	34HQ0XY0K	5/25/2022
10	34HQ0XY0C	5/25/2022
11	34HQ0XY01	5/25/2022
12	34HQ0XXGH	5/25/2022
13	34HQ0XXGG	5/25/2022
14	34HQ0XXGF	5/25/2022
15	34HQ0XXGD	5/25/2022
16	34HQ0XXGB	5/25/2022
17	34HQ0XXG9	5/25/2022
18	34HQ0XXG8	5/25/2022
19	34HQ0XXG7	5/25/2022
20	34HQ0XZMP	5/27/2022

**In violation of 18 U.S.C. § 1343.**

**FORFEITURE ALLEGATION**

Upon conviction of any offense set forth in Counts 1 through 20 of this Indictment, the defendant, Erlisa King, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation(s), including, but not limited to a sum of money equal to at least \$200,000.00, which represents the amount of proceeds the defendant obtained as a result of the offense(s).

**SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

**A TRUE BILL.**

/S/

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**FOREPERSON**

**KENNETH L. PARKER**  
**UNITED STATES ATTORNEY**

  
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**TIMOTHY LANDRY, MA 669554**  
**SPECIAL ASSISTANT UNITED STATES ATTORNEY**